

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

COVER SHEET FOR AMENDMENTS

Case Name: Dailey Law Firm PC

Case No.: 23-45970-mlo

DESCRIBE INFORMATION BEING AMENDED BY CHECKING APPLICABLE BOX(ES) BELOW:

☐ **Amendment to Petition:**

☐ Name ☐ Debtor(s) Mailing Address ☐ Alias

☐ Signature ☐ Complying with Order Directing the Filing of Official Form(s)

☐ **Summary of Your Assets and Liabilities and Certain Statistical Information**

☐ **Statement of Financial Affairs**

☒ **Schedules and List of Creditors:**

☒ Schedule A/B

☐ Schedule C ☐ Debtor 2 Schedule C

☐ List of Creditors ☐ Schedule D ☐ Schedule E/F and

☐ Add creditor(s), provide address of creditor already on the List of Creditors, change amount or classification of debt - **\$32.00 Fee Required**, or

☐ Change address of a creditor already on the List of Creditors - **No Fee Required**

☐ Schedule G

☐ Schedule H

☐ Schedule I

☐ Schedule J

☐ Schedule J-2

NOTE: Use Page 2 for any corrections or additions to the List of Creditors.

Additional Details of Amendment(s): _____

➔ **DECLARATION OF ATTORNEY:** I declare that the above information contained on this cover sheet may be relied upon by the Clerk of the Court as a complete and accurate summary of the information contained in the documents attached.

Date
August 7, 2023

Signature
/s/ Scott M. Kwiatkowski

➔ **AFFIRMATION OF DEBTOR(S):** I declare under penalty of perjury that I have read this cover sheet and the attached schedules, lists, statements, etc., and that they are true and correct to the best of my knowledge, information and belief.

Date
August 7, 2023

Signature
/s/ Brian Dailey

CORRECTIONS TO THE LIST OF CREDITORS

Use this section to make corrections to the name(s) and address(es) of any creditor(s) listed on the current schedules and List of Creditors.

PREVIOUS NAME/ADDRESS OF CREDITOR:

PLEASE CHANGE TO:

-NONE-

ADDITIONS TO THE LIST OF CREDITORS

Use this section to identify creditors added to the schedules and List of Creditors.

NAME OF CREDITOR:

ADDRESS:

NAME OF CREDITOR:

ADDRESS:

NAME OF CREDITOR:

ADDRESS:

FOR ADDITIONAL CORRECTIONS/ADDITIONS, COPY THIS SHEET AND CONTINUE.

Fill in this information to identify the case:Debtor name Dailey Law Firm PCUnited States Bankruptcy Court for the: EASTERN DISTRICT OF MICHIGANCase number (if known) 23-45970-mlo☐ Check if this is an amended filing**Official Form 206A/B****Schedule A/B: Assets - Real and Personal Property**

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

Part 1: Cash and cash equivalents**1. Does the debtor have any cash or cash equivalents?**☐ No. Go to Part 2.☒ Yes Fill in the information below.**All cash or cash equivalents owned or controlled by the debtor****Current value of debtor's interest****3. Checking, savings, money market, or financial brokerage accounts (Identify all)**

Name of institution (bank or brokerage firm)

Type of account

Last 4 digits of account number

3.1. Huntington Bank General Business Account 9320 \$0.00

3.2. Huntington Bank-Debtor claims an interest in Ingram funds--See Schedule A/B #75 IOLTA 9333 Unknown

3.3. Huntington Expense (Checking Account) 6167 \$13,974.00

3.4. Fifth-Third Iolita 8726 \$0.00

3.5. Fifth-Third IOLTA- Michigan \$0.00

3.6. Fifth-Third Business Account \$15,494.00

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3.7. US Bank Operating Account 0263 \$73,874.00

3.8. US Bank IOLTA 5739 \$0.00

4. **Other cash equivalents (Identify all)**

5. **Total of Part 1.**

\$103,342.00

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

Part 2: Deposits and Prepayments

6. Does the debtor have any deposits or prepayments?

☐ No. Go to Part 3.

☒ Yes Fill in the information below.

7. **Deposits, including security deposits and utility deposits**

Description, including name of holder of deposit

7.1. Security Deposit \$2,500.00

8. **Prepayments, including prepayments on executory contracts, leases, insurance, taxes, and rent**

Description, including name of holder of prepayment

9. **Total of Part 2.**

\$2,500.00

Add lines 7 through 8. Copy the total to line 81.

Part 3: Accounts receivable

10. Does the debtor have any accounts receivable?

☐ No. Go to Part 4.

☒ Yes Fill in the information below.

11. **Accounts receivable**

11a. 90 days old or less: 636,500.00 - 0.00 = \$636,500.00
face amount doubtful or uncollectible accounts

12. **Total of Part 3.**

\$636,500.00

Current value on lines 11a + 11b = line 12. Copy the total to line 82.

Part 4: Investments

13. Does the debtor own any investments?

☒ No. Go to Part 5.

☐ Yes Fill in the information below.

Part 5: Inventory, excluding agriculture assets

18. Does the debtor own any inventory (excluding agriculture assets)?

☐ No. Go to Part 6.

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☒ Yes Fill in the information below.

	General description	Date of the last physical inventory	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
19.	Raw materials				
20.	Work in progress Civil Action Litigation files 36 cases currently in litigation or presuit settlement negotiations		\$0.00		Unknown
21.	Finished goods, including goods held for resale				
22.	Other inventory or supplies Paper, envelopes, various office supplies, toner		\$0.00		\$500.00

23. Total of Part 5.

Add lines 19 through 22. Copy the total to line 84.

\$500.00

24. Is any of the property listed in Part 5 perishable?

- ☒ No
☐ Yes

25. Has any of the property listed in Part 5 been purchased within 20 days before the bankruptcy was filed?

- ☒ No
☐ Yes. Book value _____ Valuation method _____ Current Value _____

26. Has any of the property listed in Part 5 been appraised by a professional within the last year?

- ☒ No
☐ Yes

Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)

27. Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?

- ☒ No. Go to Part 7.
☐ Yes Fill in the information below.

Part 7: Office furniture, fixtures, and equipment; and collectibles

38. Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?

- ☐ No. Go to Part 8.
☒ Yes Fill in the information below.

	General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
39.	Office furniture Office Furniture	\$0.00		\$10,000.00

40. Office fixtures

41. Office equipment, including all computer equipment and

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communication systems equipment and software
8 Computers, Telephones, Fax Machines, 3
Copiers,

\$0.00

\$5,000.00

42. **Collectibles** *Examples:* Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; china and crystal; stamp, coin, or baseball card collections; other collections, memorabilia, or collectibles

43. **Total of Part 7.**

Add lines 39 through 42. Copy the total to line 86.

\$15,000.00

44. **Is a depreciation schedule available for any of the property listed in Part 7?**

☒ No
☐ Yes

45. **Has any of the property listed in Part 7 been appraised by a professional within the last year?**

☒ No
☐ Yes

Part 8: Machinery, equipment, and vehicles

46. **Does the debtor own or lease any machinery, equipment, or vehicles?**

☐ No. Go to Part 9.
☒ Yes Fill in the information below.

General description

Include year, make, model, and identification numbers
(i.e., VIN, HIN, or N-number)

**Net book value of
debtor's interest**
(Where available)

**Valuation method used
for current value**

**Current value of
debtor's interest**

47. **Automobiles, vans, trucks, motorcycles, trailers, and titled farm vehicles**

47.1. 2010 Cadillac DTX

\$0.00

\$3,500.00

48. **Watercraft, trailers, motors, and related accessories** *Examples:* Boats, trailers, motors, floating homes, personal watercraft, and fishing vessels

49. **Aircraft and accessories**

50. **Other machinery, fixtures, and equipment (excluding farm machinery and equipment)**

51. **Total of Part 8.**

Add lines 47 through 50. Copy the total to line 87.

\$3,500.00

52. **Is a depreciation schedule available for any of the property listed in Part 8?**

☒ No
☐ Yes

53. **Has any of the property listed in Part 8 been appraised by a professional within the last year?**

☒ No
☐ Yes

Part 9: Real property

54. **Does the debtor own or lease any real property?**

☒ No. Go to Part 10.
☐ Yes Fill in the information below.

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Part 10: Intangibles and intellectual property

59. Does the debtor have any interests in intangibles or intellectual property?

- ☒ No. Go to Part 11.
☐ Yes Fill in the information below.

Part 11: All other assets

70. Does the debtor own any other assets that have not yet been reported on this form?

Include all interests in executory contracts and unexpired leases not previously reported on this form.

- ☐ No. Go to Part 12.
☒ Yes Fill in the information below.

Current value of
debtor's interest

71. **Notes receivable**
Description (include name of obligor)
72. **Tax refunds and unused net operating losses (NOLs)**
Description (for example, federal, state, local)
73. **Interests in insurance policies or annuities**
74. **Causes of action against third parties (whether or not a lawsuit has been filed)**
Lawsuit against former employee Lauren Sitto et al
Damages alleged approx 600K
- | | |
|------------------|-----------------------|
| Nature of claim | Collection/Conversion |
| Amount requested | \$0.00 |

Unknown

75. **Other contingent and unliquidated claims or causes of action of every nature, including counterclaims of the debtor and rights to set off claims**
Interest of Funds in IOLTA account as it relates to Interpleader. Debtor has an interest in \$80,000.00 of funds related to 21-007081. Further client is entitled to attorney fees as Plaintiff in Interpleader.
- | | |
|------------------|---------------|
| Nature of claim | Attorney Fees |
| Amount requested | \$80,000.00 |

\$80,000.00

76. **Trusts, equitable or future interests in property**
77. **Other property of any kind not already listed** Examples: Season tickets, country club membership

78. **Total of Part 11.**

Add lines 71 through 77. Copy the total to line 90.

\$80,000.00

79. **Has any of the property listed in Part 11 been appraised by a professional within the last year?**

- ☒ No
☐ Yes

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Part 12: Summary

In Part 12 copy all of the totals from the earlier parts of the form

Type of property	Current value of personal property	Current value of real property
80. Cash, cash equivalents, and financial assets. <i>Copy line 5, Part 1</i>	<u>\$103,342.00</u>	
81. Deposits and prepayments. <i>Copy line 9, Part 2.</i>	<u>\$2,500.00</u>	
82. Accounts receivable. <i>Copy line 12, Part 3.</i>	<u>\$636,500.00</u>	
83. Investments. <i>Copy line 17, Part 4.</i>	<u>\$0.00</u>	
84. Inventory. <i>Copy line 23, Part 5.</i>	<u>\$500.00</u>	
85. Farming and fishing-related assets. <i>Copy line 33, Part 6.</i>	<u>\$0.00</u>	
86. Office furniture, fixtures, and equipment; and collectibles. <i>Copy line 43, Part 7.</i>	<u>\$15,000.00</u>	
87. Machinery, equipment, and vehicles. <i>Copy line 51, Part 8.</i>	<u>\$3,500.00</u>	
88. Real property. <i>Copy line 56, Part 9.....></i>		<u>\$0.00</u>
89. Intangibles and intellectual property. <i>Copy line 66, Part 10.</i>	<u>\$0.00</u>	
90. All other assets. <i>Copy line 78, Part 11.</i>	+ <u>\$80,000.00</u>	
91. Total. Add lines 80 through 90 for each column	<u>\$841,342.00</u>	+ 91b. <u>\$0.00</u>
92. Total of all property on Schedule A/B. Add lines 91a+91b=92		<u>\$841,342.00</u>

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re: Dailey Law Firm, PC,

Debtor.

Case No. 23-45970-mlo

Chapter 11

Hon: Maria L. Oxholm

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2023 the following papers were electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the following ECF Participants:

Documents Filed:	Cover Sheet for Amendments, Amended Schedule A/B and this Certificate of Service
ECF Participants:	All parties listed by the Court for service via electronic mailing

And I hereby certify that I mailed the documents by United States Postal Service to the following non-ECF participants:

NONE

/s/ Jennifer L. Gamalski

Jennifer L. Gamalski

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Scott M. Kwiatkowski P-67871

email scott@bk-lawyer.net

Dated: August 7, 2023